

October 4, 2019

Elizabeth Adams, Director  
Air Division  
U.S. Environmental Protection Agency  
Region 9  
75 Hawthorne Street, AIR-7  
San Francisco, California 94105

Dear Ms. Adams:

The California Air Resources Board (CARB) requests that the U.S. Environmental Protection Agency (U.S. EPA) agree that the documents accompanying this request support the flagging of PM<sub>10</sub> exceedances in the Imperial County Air Pollution Control District (District) as natural or exceptional events due to high winds. The values recorded at the affected monitors have implications for the PM<sub>10</sub> nonattainment designation of the Imperial Valley Nonattainment Area.

Unusually high PM<sub>10</sub> concentrations, exceeding the 24-hour National Ambient Air Quality Standard (NAAQS or standard) of 150 µg/m<sup>3</sup>, were recorded at various monitoring sites in the District on the following dates:

- January 20, 2018
- February 11, 2018
- February 19, 2018
- April 11-12, 2018
- April 16, 2018
- April 19, 2018

The analyses and data presented in the accompanying documents demonstrate that without the high winds and entrained dust on each of these occurrences, concentrations measured at the monitoring sites would have been below the federal standard.

The 30-day public comment period required by 40 CFR 50.14(c)(3)(v) began on September 10, 2019 and will be completed on October 10, 2019 for the January and February events; the public comment period for the April events began on September 20, 2019 and will be completed on October 20, 2019. CARB is requesting parallel processing under U.S. EPA's procedure cited in 40 CFR 51, Appendix V, Section 2.3. Parallel processing is needed to expedite U.S. EPA action on the Imperial County PM<sub>10</sub> Maintenance Plan and Redesignation Request. Any comments received during the public comment period, as well as responses by the District, will be submitted to U.S. EPA at the earliest possible date.

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On October 3, 2016, U.S. EPA revised the *Treatment of Data Influenced by Exceptional Events* rule that allows data to be flagged and excluded from consideration by U.S. EPA when making decisions related to the attainment status of an area (81 FR 68216). This rule requires that states submit documentation to support the initial flagging to the appropriate U.S. EPA Regional Office.

If you have any questions regarding the enclosed documentation please contact Sylvia Vanderspek, Chief, Air Quality Planning Branch, at (916) 324-7163 or via email at [sylvia.vanderspek@arb.ca.gov](mailto:sylvia.vanderspek@arb.ca.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Michael T. Benjamin", followed by the initials "G MTB" in a smaller, less legible script.

Dr. Michael T. Benjamin, Chief  
Air Quality Planning and Science Division

Enclosure (CD)

cc: (without enclosure)

Mr. Matt Dessert  
Air Pollution Control Officer  
Imperial County Air Pollution Control District  
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Ms. Gwen Yoshimura, Manager  
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Ms. Jennifer Williams  
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Ms. Sylvia Vanderspek, Chief  
Air Quality Planning Branch  
Air Quality Planning and Science Division